Protass Law PLLC

260 Madison Avenue 22nd Floor New York, NY 10016

T: 212-455-0335 F: 646-607-0760 hprotass@protasslaw.com

March 16, 2020

submitted.

Harlan Protass

VIA ECF AND U.S. MAIL

Honorable Loretta A. Preska United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

Re: United States v. Eric Millan, Case No. 91-CR-685 (LAP)

Dear Judge Preska:

This firm, together with Professor Douglas A. Berman of the Moritz College of Law at The Ohio State University, represents defendant Eric Millan in connection with his 18 U.S.C. § 3582(c)(1)(A) "compassionate release" motion, dated November 13, 2019. (Docket Nos. 1046 and 1047.) On March 13, 2020 the government filed an opposition to Mr. Millan's "compassionate release" motion. (Docket No. 1052.) We write today to respectfully request thirty (30) days – until April 13, 2020 – to submit a reply memorandum of law in further support of Mr. Millan's "compassionate release" motion. I have spoken with Assistant United States Attorney Emily Johnson, who consents to the foregoing request.

Thank you for your consideration and attention to this matter.

The request is granted. SO ORDERED.

3/16/2020

cc:

Coulta a. Presing

Emily Johnson, Esq. (via ECF) Assistant United States Attorney

Professor Douglas A. Berman (via e-mail)